

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**KOSS CORPORATION,**

*Plaintiff,*

v.

**APPLE INC.,**

*Defendant.*

**Case No. 6:20-cv-00665-ADA**

**JURY TRIAL DEMANDED**

**CASE READINESS STATUS REPORT**

Plaintiff Koss Corporation (“Plaintiff” or “Koss”) and Defendant Apple Inc. (“Defendant” or “Apple”), hereby provide the following status report in advance of the initial Case Management Conference (CMC).

**FILING AND EXTENSIONS**

Plaintiff’s Complaint was filed on July 23, 2020.

**RESPONSE TO THE COMPLAINT**

Defendant responded to the Complaint on August 7, 2020 by filing a Motion to Strike the Complaint pursuant to Federal Rule of Civil Procedure 12(f). Plaintiff filed its Response in Opposition to Defendant’s Motion to Strike on August 21, 2020, pursuant to the parties’ agreed extension. Defendant filed its Reply in Support of its Motion to Strike on August 31, 2020.

**PENDING MOTIONS**

Defendant’s aforementioned Motion to Strike is currently pending.

**RELATED CASES IN THIS JUDICIAL DISTRICT**

Koss Corporation v. Bose Corporation; 6:20-cv-0661-ADA

Koss Corporation v. PEAG LLC d/b/a JLAB Audio; 6:20-cv-00662-ADA

Koss Corporation v. Plantronics, Inc. and Polycom, Inc.; 6:20-cv-00663-ADA

Koss Corporation v. Skullcandy, Inc.; 6:20-cv-00664-ADA

Plaintiff believes that these related cases should be consolidated, to the extent possible and particularly with regard to common issues, such as claim construction. Apple does not agree to the consolidation of any cases for trial, and submits that any other issues can be addressed once all defendants have responded to the complaints in their respective actions.

**IPR, CBM, AND OTHER PGR FILINGS**

There are no known IPR, CBM, or other PGR filings.

**NUMBER OF ASSERTED PATENTS AND CLAIMS**

Plaintiff has asserted five (5) patents and a total of five (5) claims. Plaintiff intends to assert additional claims from the five presently asserted patents in its preliminary infringement contentions, which are forthcoming.

**APPOINTMENT OF TECHNICAL ADVISER**

At this point, the parties do not request a technical adviser to be appointed to the case to assist the Court with claim construction or other technical issues.

**MEET AND CONFER STATUS**

Plaintiff and Defendant conducted a meet and confer conference. The parties have no pre-Markman issues to raise at the CMC.

Dated: October 20, 2020

Respectfully submitted,

*/s/ Darlene F. Ghavimi*

Darlene F. Ghavimi

Texas State Bar No. 24072114

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 20, 2020, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Western District of Texas, using the CM/ECF filing system of the court for electronic service on all parties.

*/s/ Darlene F. Ghavimi*  
Darlene F. Ghavimi